National Park Service Park-level Model Environmental Management System (Model EMS)

"In an organization like this, short-handed as we are and with all the exceptional episodes that have to be dealt with, we are inclined to devote a disproportionate amount of time to the mechanics of our business and a minimum to the fundamentals, which deal many times with intangibles. It is good, therefore, that there are thinkers who periodically call us back to consideration of the matters of prime importance."

— Written in October 1944, by Newton Drury, National Park Service Director in a letter to Ansel Adams.

Environmental Management System (EMS) standards and models were developed out of the desire to focus an organization's time and effort on environmental matters of prime importance while making the mechanics of environmental compliance and management easier and more reliable. The principles of an EMS are so simple and universally sound that they are being adopted by organizations of all types, public and private.

An EMS provides a proactive approach to environmental management that emphasizes internal goal setting and planning as a means to achieve lasting environmental benefits. It emphasizes effectiveness, efficiency, and continuous improvement as opposed to reactive, crisis-based management. The beauty of an EMS approach is that every organization, from the National Park Service to a large corporation to a small state historic site, can utilize their knowledge and resources to custom-design an EMS that focuses on environmental issues of prime importance to them. The park-level EMS can build upon existing programs, which means incurring fewer costs compared to adopting an entirely new system to address environmental issues.

An EMS approach also offers opportunities for integration with other initiatives of concern to NPS facilities without a duplication of effort. For instance, the principles and objectives of the NPS Environmental Leadership initiative are fully consistent with a park-level EMS. The EMS in fact can provide the very framework as well as the tools to establish the lasting principles of sound, responsive and responsible environmental leadership throughout the NPS.

Our National Parks have the benefit of being closer to the environment than almost any other organization in the country. Therefore, The National Park Service is in the unique position to witness opportunities for both short-term and long term improvements to the surrounding environment. In developing an EMS for each park, the NPS has a significant advantage in the environmental knowledge and commitment of each park employee and in being an organization where virtually every program has some environmental interaction.

This NPS Model EMS has been designed to be consistent with accepted EMS designs in use today, most notably the International Organization for Standardization's ISO 14001 standard and the federal Code of Environmental Management Principles (CEMP). It is also designed to conform to the requirements of Executive Order 13148–Greening The Government Through Leadership In Environmental Management, NPS Director's Order #13: Environmental Management Systems (in draft), and the Department of the Interior (DOI) Department Manual.

The NPS leadership expects each park-level facility to adopt and implement the Model EMS. Support for this

implementation effort at the park-level is extensive and includes: EMS training, an EMS Toolkit, an EMS Help Desk/Hotline, an EMS web site, and other practical resources.

The NPS leadership recognizes that some parks may choose not to utilize the EMS Toolkit and the other resources developed for the park-level EMS. Any EMS developed by an NPS park facility must, however, be consistent with the principles set forth in this Model EMS.

THE PARK-LEVEL MODEL EMS

The park-level Environmental Management System that the National Park Service utilizes is composed of eight major elements, or sections:

- Environmental Commitment Statement
- Facility Activities and Environmental Impacts
- Goals, Objectives, and Targets
- Roles, Responsibilities, and Accountability
- Document Control, Recordkeeping, and Reporting
- Communication
- Training
- Monitoring, Measurement, Corrective Action, and Management Review

Each of these eight elements has specific requirements designed to provide consistency of approach and interpretation throughout the NPS. These minimum requirements must be included in each park's EMS but should be tailored to reflect the conditions at each facility so that the system is meaningful and effective. The EMS Toolkit and other available resources provide implementation guidance and interpretive assistance to park staff involved in developing their EMS.



Environmental Commitment Statement

- Each facility shall develop and document a commitment statement affirming the facility's intent to strive for exemplary environmental management.
- The commitment statement should be site-specific to the facility that is undertaking an EMS as well as incorporating appropriate broader regional and service-wide goals and objectives.
- The statement must commit to compliance with all applicable laws, including federal, state, and local laws, regulations, requirements, policies, and Executive Orders addressing the protection of the environment.
- The statement must commit to environmental leadership by incorporating pollution prevention, waste reduction, best management practices, and environmentally preferable purchasing in all park management activities.
- The statement must commit facilities to strive for continual environmental improvement in those areas identified within the park EMS.



Facility Activities and Environmental Impacts

- The facility must establish, implement, and document procedures that consider the potential environmental impacts of all activities within their operations.
- Selected activities and their environmental impacts will establish the basis for setting specific environmental objectives and targets. The EMS approach is designed to move facilities beyond minimal regulatory compliance and to encourage environmental leadership in all aspects of a facility's environmental interactions. Therefore, compliance should be considered a critical component of an EMS, but it should not form the exclusive objective, or target.



Goals, Objectives, and Targets

- Procedures to identify specific goals, objectives, and targets relating to impacts will be developed, documented, and then implemented. Goals, objectives, and targets are chosen based on the above developed procedures.
- Goals, objectives, and targets should be quantified, a timeframe proposed for their achievement and action plans established.
- Management and external auditors will assess the timely achievement of goals, objectives, and targets in a review of the EMS.
- Continual improvement includes a requirement for periodic reviews of the relevance and achievement of documented goals, objectives, and targets. At a minimum these reviews shall be held annually.
- New goals, objectives, and targets may be added at any time. New goals, objectives, and targets must always be set when previous goals, objectives, and targets have been accomplished or are otherwise determined to no longer be relevant.



Roles, Responsibilities and Accountability

- Each facility shall assign roles and responsibilities that allow for the goals, objectives, and targets to be achieved.
- For the EMS to function effectively, personnel, budget, and organizational issues, among others, should be considered in assigning roles and responsibilities.
- Position descriptions will include EMS-related responsibilities and performance standards. Personnel will be evaluated on their performance in carrying out EMS-related responsibilities during their annual performance review.



Document Control, Recordkeeping and Reporting

- Documents and records are used to demonstrate a facility's compliance with laws, requirements, policies, and standard operating procedures in many aspects of management. Documents and records will serve the same purpose within an EMS.
- A facility will develop procedures that, when executed, will demonstrate that the organization has effectively carried out all the elements of its EMS.



Communication

- Internal Communication Parks will strive to make employees and supervisors aware of the facility's EMS and their role in the commitment to environmental performance and leadership. The communications will emphasize, at a minimum, those facility activities and their environmental impacts that are linked to current goals, objectives and targets.
- External Communication Parks are encouraged to work with communities, external stakeholders, and the public to develop and share outstanding environmental accomplishments through appropriate media such as wayside exhibits, brochures, and educational materials.



Training

• Documented procedures will be developed and executed to ensure that all individuals that have a role or responsibility within the EMS have the understanding and capability to carry out that role or responsibility. Training needs must be identified and tailored to the needs of the position of the individual within an EMS and will be documented.



Monitoring, Measurement, Corrective Action, and Management Review

- Procedures will be implemented to determine whether or not the EMS is achieving its stated goals, objectives, and targets. As reflected in the parks' Environmental Commitment Statement and NPS policy, compliance with applicable laws is required. A facility should consider the results of recent environmental audits as one set of monitoring and measurement data.
- Procedures will be developed and implemented to provide for corrective action to remedy those elements of the EMS that fail to achieve established goals, objectives, and targets.
- Management review requires the documented periodic review of the performance of an EMS to determine
 whether it is achieving the intent of the Environmental Commitment Statement. Developed procedures will
 provide for the execution of corrective actions when it is determined that the intent of the Environmental
 Commitment Statement is not being achieved.